

**From:** [Casey, Carolyn](#)  
**To:** [Craig Ziady](#)  
**Cc:** [Gregory Flaherty](#); [Bruce Hoskins](#); [Wainberg, Daniel](#); [Zucker, Audrey](#)  
**Subject:** RE: Former USM facility, Beverly, MA  
**Date:** Wednesday, November 22, 2017 9:53:00 AM

---

10:30 on Nov 30 works for me and a conference call would be fine. It will likely just be me. Until there is a written response to the comments, we don't see any reason to involve our risk assessor. I will answer what I can and follow-up with responses to questions that I cannot answer.

Thanks

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

[casey.carolyn@epa.gov](mailto:casey.carolyn@epa.gov)

---

**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Friday, November 17, 2017 6:02 PM

**To:** Casey, Carolyn

**Cc:** Gregory Flaherty ; Bruce Hoskins ; Wainberg, Daniel ; Zucker, Audrey

**Subject:** RE: Former USM facility, Beverly, MA

Hi Carolyn – Sounds good, thank you. How about 10:30 AM on November 30? Do you prefer an in-person meeting or a conference call? Could you please let me know who from EPA will be participating? It would be helpful, I think, to be able to speak in detail about some of the ecological issues/approaches.

As for sampling, now that the drilling is completed, we plan to sample those groundwater wells that are not related to the vapor intrusion assessment during the week of December 11. These would include the following new wells, with the planned analysis parameters indicated:

FSL-1: PCB Homologs

FSL-2: VOCs (EPA Method 8260)

FSL-3: PCB Homologs

FSL-4: VPH/EPH, PCB Homologs

FSL-5: VPH/EPH, PCB Homologs

FSL-6: VPH/EPH, VOCs (EPA Method 8260)

FSL-7: VPH/EPH, VOCs (EPA Method 8260)

FSL-11: VPH/EPH, PCB Homologs

FSL-12: VPH/EPH, PCB Homologs

FSL-13: VPH/EPH, PCB Homologs

FSL-14: VPH/EPH, PCB Homologs

FSL-15: VPH/EPH

We anticipate the vapor intrusion assessment would begin in January 2018.

Please let me know if you have any questions.

Thanks.

Happy Thanksgiving.

Craig

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*200 West Cummings Park*

*Woburn, MA 01801*

*Direct dial: 781-932-7034*

*Main No.: 781-935-8000*

[www.cummings.com](http://www.cummings.com)

The information contained in this message may be privileged, confidential, and/or protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it (and all attachments) from your computer.

---

**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Friday, November 17, 2017 8:18 AM

**To:** Craig Ziady

**Cc:** Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty; Zucker, Audrey

**Subject:** RE: Former USM facility, Beverly, MA

Could I please get a detailed schedule of the field work so I can observe when my schedule allows. As a reminder Section IX.17.k. of the order states the following:

**Communications:** Respondents and EPA will communicate frequently, cooperatively, and in good faith with each other to assure successful completion of the requirements of this Order. In addition, Respondents shall schedule a meeting with EPA at least once a month to discuss the Work proposed and performed under this Order.

Respondents shall notify EPA with a proposed date for sampling: (1) at least 21 days in advance of any sampling activities; (2) thereafter, weekly up to the date of sampling; and (3) when a sampling date is firm.

Regarding your request... "Could you please also let me know at your convenience when you might be available to meet briefly to discuss the ecological assessment with us and with the ecological contractor."

I am available all day next Monday 11/20, and Tues 11/21 and Wed before 10:00. The week of Nov 27<sup>th</sup>, I am available all day Mon and Wed, and Thurs except 11:30-12:30.

Thanks

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

[casey.carolyn@epa.gov](mailto:casey.carolyn@epa.gov)

---

**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Wednesday, November 08, 2017 5:19 PM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>

**Cc:** Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>; Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>

**Subject:** RE: Former USM facility, Beverly, MA

Hi Carolyn – Thanks for reaching out. I was out of town last week.

The GPR and drilling work is ongoing. Sampling is expected to commence thereafter, probably beginning in December given the timing of the final approval by EPA and the DigSafe/GPR/drilling work.

In response to your recent request for additional information relative to the location of the former North Shore Regional Vocational School machine shop, please see the enclosed excerpt from a May 19, 1989 AHERA Management Plan prepared by Hygeia, Inc. This report, which related to asbestos-containing material within the old USM building, contained detailed handwritten plans of the layout of the NSRVHS, including characterization of the floor sequence as “basement” through “third floor” (see attached plans). Please confirm that we may pursue the PCB sampling in the area shown as “Machine Tech” rooms shown on the “Third Floor Plan,” as proposed.

Could you please also let me know at your convenience when you might be available to meet briefly to discuss the ecological assessment with us and with the ecological contractor? We believe it would be advantageous for us all to have a brief meeting prior to submittal of the work plan and can make ourselves available for a conference call or meeting that works for your schedule.

Finally, in response to your request for two minor revisions to the QAPP, please see attached (revised) page 15, which incorporates your changes. This page may be substituted for the previously submitted page 15 of the QAPP.

Thanks very much.

As always, please let me know if you have any questions.

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*200 West Cummings Park*

*Woburn, MA 01801*

*Direct dial: 781-932-7034*

*Main No.: 781-935-8000*

*[www.cummings.com](http://www.cummings.com)*

The information contained in this message may be privileged, confidential, and/or protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it (and all attachments) from your computer.

---

**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Wednesday, November 08, 2017 2:25 PM

**To:** Craig Ziady

**Cc:** Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty; Zucker, Audrey

**Subject:** RE: Former USM facility, Beverly, MA

Could I please get an update on when work will start?

Thank You,

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

[casey.carolyn@epa.gov](mailto:casey.carolyn@epa.gov)

---

**From:** Casey, Carolyn

**Sent:** Wednesday, October 11, 2017 8:09 AM

**To:** 'Craig Ziady' <[craig@cummings.com](mailto:craig@cummings.com)>

**Cc:** Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; 'Bruce Hoskins' <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; 'Gregory Flaherty' <[gxf@cummings.com](mailto:gxf@cummings.com)>; Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>

**Subject:** RE: Former USM facility, Beverly, MA

As promised, pdf version attached.

---

**From:** Casey, Carolyn

**Sent:** Friday, October 06, 2017 2:21 PM

**To:** 'Craig Ziady' <[craig@cummings.com](mailto:craig@cummings.com)>

**Cc:** Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>; Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>

**Subject:** RE: Former USM facility, Beverly, MA

Please see the attached files. I apologize for the unorthodox method of sending these documents but I have been waiting for IT to fix my scanner and I didn't want to wait any longer. I will send signed pdf documents ASAP. A hard copy to Craig will be in the mail next week.

Thanks

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

[casey.carolyn@epa.gov](mailto:casey.carolyn@epa.gov)

---

**From:** Craig Ziady [[mailto:craig@cummings.com](mailto:mailto:craig@cummings.com)]

**Sent:** Thursday, October 05, 2017 5:15 PM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>

**Subject:** RE: Former USM facility, Beverly, MA

Hi Carolyn – Both items are attached. Please return a fully executed Title and Approval page when it is completed.

Thank you.

Craig

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*200 West Cummings Park*

*Woburn, MA 01801*

*Direct dial: 781-932-7034*

*Main No.: 781-935-8000*

[www.cummings.com](http://www.cummings.com)

The information contained in this message may be privileged, confidential, and/or protected from disclosure. If the reader of

this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it (and all attachments) from your computer.

---

**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Thursday, October 05, 2017 3:18 PM

**To:** Craig Ziady

**Cc:** Zucker, Audrey; Wainberg, Daniel; Bruce Hoskins; Gregory Flaherty

**Subject:** RE: Former USM facility, Beverly, MA

Just to clarify, I was looking for the original unmodified version of the figure for the vocational school. When should I expect this and the QAPP signature page?

---

**From:** Casey, Carolyn

**Sent:** Wednesday, October 04, 2017 4:35 PM

**To:** 'Craig Ziady' <[craig@cummings.com](mailto:craig@cummings.com)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>;

Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>

**Subject:** RE: Former USM facility, Beverly, MA

Thank you for the recent submittals. Could you please scan and email the figure for the Vo Tech school. It was not included in the SAP. Also, please sign the QAPP approval page and email that to me as well. I expect to send out an approval as soon as I get these.

Thanks

Carolyn

---

**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Friday, September 29, 2017 1:25 PM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>;

Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>

**Subject:** RE: Former USM facility, Beverly, MA

Hi Carolyn – Further to our recent correspondence and as a supplement to our written responses, please find enclosed redlined versions of the QAPP, USM Written Proposal/SAP, and Elliott Landing SAP that reflect the changes made pursuant to EPA's comments. I will forward a link to the full QAPP (766 pages) under separate cover due to its file size.

Please let me know if you have any questions.

Thank you

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*200 West Cummings Park*

*Woburn, MA 01801*

*Direct dial: 781-932-7034*

*Main No.: 781-935-8000*

[www.cummings.com](http://www.cummings.com)

The information contained in this message may be privileged, confidential, and/or protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it (and all attachments) from your computer.

---

**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Wednesday, September 27, 2017 4:23 PM

**To:** Craig Ziady; Bruce Hoskins; Gregory Flaherty

**Cc:** Zucker, Audrey; Wainberg, Daniel

**Subject:** RE: Former USM facility, Beverly, MA

The timeline for submittals is in the order. The comments were sent by email 9/5. The hard copy was received 9/11 so revised reports were due by 9/25. That being said, an extension until Friday would be acceptable.

---

**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Wednesday, September 27, 2017 11:05 AM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>

**Subject:** RE: Former USM facility, Beverly, MA

Hi Carolyn – We were attempting to move this process along most efficiently by not resubmitting all of the reports and simply providing our responses, so they could be incorporated in the reports once EPA approved them. I'm sorry you viewed this as inadequate.

We will revise the documents per your request, but we are not going to be able to finalize them by close of business today. Given that no deadline existed for the comment responses in the first place, they are by no means late. We assume you will not object/disapprove if the documents are submitted by the end of the week.

Please confirm. We will begin working on them today.

With regard to the specific comment you reference, this is specifically addressed in the SOP. Given the number of plans/reports we are submitting, there will, of course, be cross-references to one another, which is what occurred here.

Thank you.

Craig

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*200 West Cummings Park*

*Woburn, MA 01801*

*Direct dial: 781-932-7034*

*Main No.: 781-935-8000*

[www.cummings.com](http://www.cummings.com)

The information contained in this message may be privileged, confidential, and/or protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it (and all attachments) from your computer.

---

**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Wednesday, September 27, 2017 10:03 AM

**To:** Craig Ziady; Bruce Hoskins; Gregory Flaherty

**Cc:** Zucker, Audrey; Wainberg, Daniel

**Subject:** FW: Former USM facility, Beverly, MA

Craig, This response is inadequate. It's not possible to complete our review without actually seeing the revisions in context. The response to comments alone is insufficient. I will issue a formal disapproval by the end of the day if the comments have not all been appropriately addressed within the documents and resubmitted by COB today.

Again, a complete review could not be completed but I am passing the following comments along now regarding the Written proposal/SAP North Parcel

This response does not address the second part of the comment asking if more than one sample will be collect at each depth interval. The point being that multiple concrete samples need to

be collected at each location for each depth interval in order to collect a sufficient volume to achieve required detection limits. Again, please re-visit the SOPs.

**EPA Comment:** In the second paragraph on page 24, the discussion of the SOP for concrete needs to be revisited. The 0-0.05 inch-depth interval does not make sense. Further, it is unclear if only 1 sample would be collected at each depth interval per sample location. If so, this would likely not be a sufficient volume for the laboratory to achieve required detection limits.

**Response:** *The text has been revised consistent with the STANDARD OPERATING PROCEDURE FOR SAMPLING POROUS SURFACES FOR POLYCHLORINATED BIPHENYLS (PCBs) in the QAPP. The 0-0.05 inch depth interval has been eliminated. Intervals to be collected will be 0-0.5 inches and 0.5-1.0 inches.*

Regarding the Elliot Landing SAP and the first comment in the response. This section should clarify what threshold criteria means as stated in the last response from Cummings (It should be clear threshold criteria is not referring to threshold values).

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

[casey.carolyn@epa.gov](mailto:casey.carolyn@epa.gov)

---

**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Friday, September 22, 2017 5:52 PM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>

**Cc:** Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>; Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>

**Subject:** RE: Former USM facility, Beverly, MA

Hi Carolyn – Thank you for your most recent set of comments. Please see our responses attached. We have not included final amended documents, as it seems to make sense to finalize the comments first rather than proceed through the exercise of making serial minor revisions to the plans and documents at each stage. We will provide final revised documents promptly following resolution of these final comments.

As always, please let me know if you have any questions.

Thank you.

Best,

Craig

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*200 West Cummings Park*

*Woburn, MA 01801*

*Direct dial: 781-932-7034*

*Main No.: 781-935-8000*

[www.cummings.com](http://www.cummings.com)

The information contained in this message may be privileged, confidential, and/or protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by

replying to the message and deleting it (and all attachments) from your computer.

---

**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]

**Sent:** Tuesday, September 05, 2017 4:27 PM

**To:** Craig Ziady

**Cc:** Zucker, Audrey; Bruce Hoskins; Gregory Flaherty; Wainberg, Daniel; Knox, Rosemary (DEP); Miano, John (DEP)

**Subject:** RE: Former USM facility, Beverly, MA - redlined documents

Please see attached. A hard copy to follow to Craig only. If others would like one, please let me know.

Thanks

Carolyn

Carolyn J. Casey

U.S. Environmental Protection Agency

5 Post Office Square, Suite 100

Mail code OSRR 07-3

Boston, MA 02109-3912

P 617-918-1368

F 617-918-0368

[casey.carolyn@epa.gov](mailto:casey.carolyn@epa.gov)

---

**From:** Craig Ziady [<mailto:craig@cummings.com>]

**Sent:** Friday, August 04, 2017 12:35 PM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>;

Gregory Flaherty <[gxf@cummings.com](mailto:gxf@cummings.com)>

**Subject:** Former USM facility, Beverly, MA - redlined documents

Carolyn - Finally, as a supplement to the full reports sent under separate cover, here are the redline versions of the QAPP, USM Written Proposal, and Elliott Landing SAP.

We did not prepare separate redlines of the QMP or HASP due to the singular changes to those documents.

Please let me know if you have any questions.

Thank you.

Craig

*Craig J. Ziady*

*General Counsel*

*Cummings Properties, LLC*

*200 West Cummings Park*

*Woburn, MA 01801*

*Direct dial: 781-932-7034*

*Main No.: 781-935-8000*

[www.cummings.com](http://www.cummings.com)

The information contained in this message may be privileged, confidential, and/or protected from disclosure. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by replying to the message and deleting it (and all attachments) from your computer.